

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(BOSTON DIVISION)

CASE NO. 17-CR-10265

UNITED STATES OF AMERICA,

Plaintiff,

v.

SALLY ANN JOHNSON,

Defendant.

MOTION FOR PERMISSION TO TRAVEL

The Defendant, SALLY ANN JOHNSON, through undersigned counsel, respectfully requests that this Honorable Court grant the Defendant permission to travel to Miami, Florida, from Saturday, November 18, 2017, to Tuesday, November 28, 2017. In support, the Defendant states as follows:

1. The Defendant has been on bond and has complied with all conditions thereof.

2. The Defendant requests permission to travel with her family to Miami, Florida, from Saturday, November 18, 2017, to Tuesday, November 28, 2017. The Defendant will be spending the Thanksgiving holiday with her domestic partner and children. The Defendant will also be meeting with her attorneys while in Miami, Florida. The Defendant will provide her Pretrial Services Officer with all of her trip information.

3. Pursuant to Local Rule 7.1 (a)(2), the Assistant United States Attorney assigned to this matter advised that he does not object to the instant request. United States Pretrial Officer Lea Harmon does not oppose the instant request.

WHEREFORE, the Defendant, SALLY ANN JOHNSON, through undersigned counsel, respectfully requests that this Honorable Court grant the Defendant permission to travel to Miami, Florida, from Saturday, November 18, 2017, to Tuesday, November 28, 2017.

Respectfully submitted,

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By: s/ Paul Petruzzi
PAUL D. PETRUZZI, ESQ.
Florida Bar No. 982059

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 8, 2017, a true and correct copy of the foregoing was furnished by CM/ECF to all counsel of record.

By: s/ Paul Petruzzi
PAUL D. PETRUZZI, ESQ.
Attorney for Defendant